

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TENNESSEE
WESTERN DIVISION**

JESSICA JONES, MICHELLE VELOTTA,
and **CHRISTINA LORENZEN** on Behalf of
Themselves and All Others Similarly Situated,

Plaintiffs,

v.

**VARSITY BRANDS, LLC; VARSITY
SPIRIT, LLC; VARSITY SPIRIT FASHION
& SUPPLIES, LLC; U.S. ALL STAR
FEDERATION, INC.; JEFF WEBB;
CHARLESBANK CAPITAL PARTNERS
LLC; and BAIN CAPITAL PRIVATE
EQUITY,**

Defendants.

Case No. 2:20-cv-02892-SHL-tmp

JURY DEMAND

PLAINTIFFS' MOTION TO COMPEL THE DEPOSITION OF ADAM BLUMENFELD

Plaintiffs Jessica Jones, Michelle Velotta, and Christina Lorenzen (collectively “Jones Plaintiffs”) and Plaintiffs Fusion Elite All Stars, Spirit Factor LLC d/b/a Fuel Athletics, Stars and Stripes Gymnastics Academy Inc. d/b/a Stars and Stripes Kids Activity Center, Kathryn Anne Radek, Lauren Hayes, and Janine Cherasaro (collectively “Fusion Elite Plaintiffs”) (collectively “Plaintiffs”) individually and on behalf of all others similarly situated, move this Court, pursuant to Fed. R. Civ. P. 37 and Local Rule 26.1(b), for an order compelling Defendants Varsity Brands, LLC, Varsity Spirit, LLC, and Varsity Spirit Fashion & Supplies, LLC (collectively, “Varsity”) to produce Adam Blumenfeld for deposition. In support of this Motion to Compel, Plaintiffs rely on the contemporaneously filed memorandum of law and all supporting documents thereto, as well as the Declaration of Elissa Buchanan (“Buchanan Decl.”), filed herewith.

Mr. Blumenfeld was noticed by Plaintiffs in the above-captioned matter on March 10, 2022 to appear for deposition under Rule 30(b)(1) under the Federal Rules of Civil Procedure on

March 31, 2022. On March 31, 2022, Varsity counsel has confirmed that Mr. Blumenfeld refuses to sit for a deposition. *See* Buchanan Decl., ¶ 2 and Exhibit 4 (Notice).

Dated: March 18, 2022

Respectfully submitted,

By: /s/ Joseph R. Saveri
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CERTIFICATE OF SERVICE

I hereby certify that on March 18, 2022, I served a copy of the foregoing document via the Court's ECF system, effecting service on all interested parties.

/s/ Joseph R. Saveri

Joseph R. Saveri